

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

05) CHARLES V. GUSTIN,
[DOB: 07/10/1982]

06) JOSHUA A. CHASE,
a/k/a Bull,
[DOB: 03/02/1984]

07) CHRISTINA R. WOLFF-PRITCHETT,
[DOB: 07/23/1984]

08) CHAD W. MOUTRAY,
[DOB: 07/05/1985]

09) JOHNNA H. WILLIAMS- MITCHELL,
[DOB: 02/09/1985]

10) ANTHONY R. BROOKSHIER,
a/k/a Ant,
[DOB: 11/27/1989]

11) TIMOTHY E. EBLING,
[DOB: 02/04/1984]

12) JOAQUIN FLOREZ,
[DOB: 07/23/1976]

13) EDWARD DWAYNE KUNZLER, JR.,
[DOB: 11/09/1982]

14) JAMIE D. SNETHEN,
[DOB: 01/20/1982]

15) JODY C. WILKINSON,
[DOB: 07/20/1974]

Case No. 13-06012-05/21-CR-SJ-HFS

COUNT ONE: (All Defendants)
21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846
NLT 10 Years; NMT Life Imprisonment
NMT \$10,000 Fine
NLT 5 Years Supervised Release
Class A Felony

COUNT TWO: (*Schank*)
18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment (Consecutive)
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class D Felony

COUNT THREE: (*Diaz*)
18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment (Consecutive)
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class D Felony

COUNT FOUR: (*E. Kunzler*)
18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment (Consecutive)
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class D Felony

COUNT FIVE: (*E. Kunzler*)
18 U.S.C. § 922(g)(1) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

\$100 Mandatory Special Assessment for each
Count

- 16) BILLY LEE FANNING,
[DOB: 08/14/1981]
- 17) BLAINE SCOTT KUNZLER,
[DOB: 06/30/1982]
- 18) RYAN LEE SCHANK,
[DOB: 11/11/1980]
- 19) PETER A. DIAZ,
[DOB: 12/11/1980]
- 20) JAMES MARCUS ACCORD,
[DOB: 08/10/1981]
- and
- 21) KODY MASONER,
[DOB: 05/28/1986]

Defendants.

THIRD SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or between August 1, 2012 and February 2015, in the Western District of Missouri, CHARLES V. GUSTIN, JOSHUA A. CHASE, a/k/a Bull, CHRISTINA R. WOLFF-PRITCHETT, CHAD W. MOUTRAY, JOHNNA H. WILLIAMS-MITCHELL, ANTHONY R. BROOKSHIER, a/k/a Ant, TIMOTHY E. EBLING, JOAQUIN FLOREZ, EDWARD DWAYNE KUNZLER, JR., JAMIE D. SNETHEN, JODY C. WILKINSON, BILLY LEE FANNING, BLAINE SCOTT KUNZLER, RYAN LEE SCHANK, PETER A. DIAZ, JAMES MARCUS ACCORD, and KODY MASONER, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, with Michael Robinson, Charles Blazer, Sean Kennedy, and Roy Owens, unindicted co-conspirators herein, and others, both known and unknown to the Grand Jury, to distribute and possess with the intent to distribute

a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in an amount of five hundred (500) grams or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

COUNT TWO

On or between November 1 and November 7, 2014, in the Western District of Missouri, RYAN LEE SCHANK, defendant herein, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute methamphetamine as alleged in Count One of the Second Superseding Indictment, incorporated herein, did knowingly possess a firearm, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT THREE

On or between August 1, 2012 and February 12, 2015, in the Western District of Missouri, PETER A. DIAZ, defendant herein, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute methamphetamine as alleged in Count One of the Second Superseding Indictment, incorporated herein, did knowingly possess a firearm, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT FOUR

On or between August 1, 2012 and February 12, 2015, in the Western District of Missouri, EDWARD DWAYNE KUNZLER, defendant herein, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute methamphetamine as alleged in Count One of the Second Superseding

Indictment, incorporated herein, did knowingly possess a firearm, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT FIVE

On or about February 12, 2015, in the Western District of Missouri, EDWARD DWAYNE KUNZLER, defendant herein, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a Taurus, Model PT24/7 Pro C DS, 9mm handgun bearing Serial Number TDP16832 and a Remington 12 gage shotgun, Model 870 bearing Serial Number V832113V, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL.

____/s/ Marsha K. Elbasani_____
FOREPERSON OF THE GRAND JURY

____/s/ Leena Ramana_____
Leena Ramana
Special Assistant United States Attorney

Dated:____3/3/15_____
Kansas City, Missouri